

POLLOCK | COHEN LLP

60 BROAD STREET, 24TH FLOOR
NEW YORK, NEW YORK 10004
(212) 337-5361

CONTACT:

Adam Pollock
Adam@PollockCohen.com
(646) 290-7251

****Memorandum Endorsed letter****

June 22, 2021

VIA ECF

Hon. James L. Garrity, Jr.
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Courtroom 601
New York, NY 10004

Re: *In re Orly Genger*, Chapter 7 Case No. 19-13895

Dear Judge Garrity:

We represent Michael Oldner, the trustee of the Orly Genger 1993 Trust. This afternoon, we were forwarded the Debtor's proposed designations (enclosed) of the June 25, 2020, March 25, 2021, and May 19, 2021 depositions of Mr. Oldner. It appears that Debtor has proposed some 285 designations.

We understand that no formal deadline has been set, with respect to Mr. Oldner's deposition, for objections and counter-designations. Because these designations appear to implicate not only the pending motion to dismiss, but also the Trustee's forthcoming settlement motion, we respectfully request the Court's leave for the parties to make objections and counter-designations by the close of business on Thursday.

Thank you for Your Honor's consideration in this matter.

Respectfully,

/s/ Adam Pollock

Adam Pollock

Enclosure

****Memorandum Endorsed Order****

All objections and counter-designations with respect to Mr. Oldner's deposition shall be filed no later than 5:00 p.m. (ET) on Thursday, June 24, 2021. (The parties are reminded to submit two single-sided courtesy copies to Chambers).

**Dated: June 23, 2021
New York, NY**

/s/ James L. Garrity, Jr.
**Honorable James L. Garrity, Jr.
United States Bankruptcy Judge**

Exhibit A

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re Orly Genger,

Debtor.

Chapter 7

Case No. 19-13895-JLG

DEBTOR'S DEPOSITION DESIGNATIONS OF MICHAEL OLDNER

**I. Debtor's Deposition Designations –
Michael Oldner's June 25, 2020 Deposition**

Beginning Page:Line	Ending Page:Line	Movant's Objection	Movant's Counter Designations
7:16	7:20		
11:17	11:21		
12:20	12:20		
35:4	35:7		
43:2	43:3		
44:19	44:21		
45:1	45:2		
45:9	45:21		
46:24	47:3		
48:6	48:17		
48:22	48:23		
54:13	54:22		
54:24	54:24		
55:22	55:25		
56:5	56:5		
57:1	57:7		
57:10	57:12		
60:19	60:24		
61:10	61:14		
61:17	61:18		
61:21	61:23		
62:10	62:13		
69:15	69:20		
70:19	70:23		
72:1	72:5		
72:8	72:9		

Beginning Page:Line	Ending Page:Line	Movant's Objection	Movant's Counter Designations
72:11	72:14		
77:9	77:11		
77:16	77:16		
79:6	79:8		
80:10	80:17		
81:15	81:16		
81:20	82:6		
82:14	82:14		
83:20	83:23		
87:25	88:4		
88:5	88:20		
89:16	90:16		
92:24	93:9		
94:1	94:9		
95:11	96:5		
100:21	100:23		
101:24	102:3		
102:7	102:13		
103:17	104:16		
105:19	105:25		
107:6	107:8		
111:9	111:12		
111:19	111:24		
112:5	112:10		
113:20	113:21		
115:8	115:13		
117:4	117:22		
119:7	119:11		
119:14	119:15		
119:20	119:22		
129:1	129:8		
129:25	130:2		
131:1	131:2		
131:7	131:18		
132:6	132:9		
151:9	151:14		
157:25	159:1		
159:6	159:9		
159:14	159:18		
163:10	164:10		
169:3	169:10		
169:15	169:20		

Beginning Page:Line	Ending Page:Line	Movant's Objection	Movant's Counter Designations
188:12	188:18		
189:7	189:17		
192:16	192:20		
195:14	195:25		
196:12	196:16		
199:4	199:22		
202:17	202:21		
202:24	203:1		
232:15	232:17		
233:2	233:6		
233:23	234:9		
234:14	235:6		
235:11	235:16		
262:5	262:10		
262:15	262:20		
283:15	283:18		
284:1	284:7		
284:10	284:19		
284:23	284:25		
285:4	285:7		
285:9	285:10		
287:1	287:4		
287:8	287:8		
289:15	289:16		
298:21	298:24		
299:1	299:13		
300:5	300:19		
302:24	303:2		
303:4	304:4		
304:7	305:2		
309:2	309:4		
309:7	309:23		
310:3	310:12		
310:16	310:17		
317:4	317:10		
318:1	318:16		
319:4	319:8		
319:19	319:20		
320:23	321:3		
359:18	359:23		
360:1	360:10		
367:21	368:9		

**II. Debtor's Deposition Designations –
Michael Oldner's March 25, 2021 Deposition**

Beginning Page:Line	Ending Page:Line	Movant's Objection	Movant's Counter-Designations
413:25	414:4		
415:1	415:10		
416:12	416:14		
420:20	421:10		
422:19	423:9		
424:5	424:7		
424:14	424:24		
426:23	427:7		
430:6	430:8		
432:11	432:21		
434:3	434:8		
434:18	435:9		
436:18	437:13		
438:10	439:2		
439:18	440:6		
442:6	442:16		
443:12	443:24		
444:3	444:8		
444:14	444:16		
446:18	447:7		
449:4	449:8		
449:10	450:2		
451:25	452:21		
454:1	455:9		
461:11	461:13		
462:8	462:13		
462:15	462:23		
463:1	463:9		
463:24	464:2		
473:3	473:6		
474:6	474:17		
475:5	475:17		
476:7	476:17		
477:21	478:5		
478:7	478:9		
481:14	481:20		
485:22	485:25		
486:4	486:4		
490:17	492:14		

Beginning Page:Line	Ending Page:Line	Movant's Objection	Movant's Counter-Designations
524:11	524:16		
524:22	525:5		
525:8	525:11		

**III. Debtor's Deposition Designations –
Michael Oldner's May 19, 2021 Deposition**

Beginning Page:Line	Ending Page:Line	Movant's Objection	Movants Counter-Designations
546:19	546:23		
553:4	553:20		
554:1	554:3		
556:3	556:4		
557:3	557:9		
558:7	558:12		
559:1	559:21		
560:1	560:1		
560:13	560:17		
561:5	561:9		
561:13	561:18		
562:11	563:11		
567:6	567:12		
567:24	568:2		
573:5	573:9		
573:21	573:25		
574:7	574:16		
574:21	574:24		
575:7	575:9		
575:19	576:9		
577:1	577:18		
577:22	578:8		
579:3	579:11		
580:12	580:13		
580:15	580:15		
580:24	580:25		
581:20	581:21		
581:23	581:23		
581:25	582:1		
586:23	586:24		
587:2	587:2		
589:23	590:2		
590:11	590:13		

Beginning Page:Line	Ending Page:Line	Movant's Objection	Movants Counter-Designations
591:5	591:8		
591:24	592:13		
596:25	597:12		
597:19	598:2		
600:16	600:19		
612:18	612:22		
613:11	613:13		
613:17	613:18		
613:20	613:20		
616:11	616:12		
616:14	616:14		
617:6	618:5		
618:10	618:12		
618:18	618:23		
619:2	619:2		
619:13	619:19		
619:22	620:1		
622:3	622:5		
622:7	622:7		
622:19	622:24		
630:21	630:24		
631:2	631:7		
631:11	631:16		
631:19	631:24		
632:7	632:13		
639:21	640:3		
640:10	640:12		
640:17	640:24		
641:8	641:14		
641:18	641:18		
643:3	643:5		
652:4	652:7		
652:11	652:11		
652:13	652:13		
655:14	656:2		
657:9	657:21		
657:24	658:11		
662:3	662:5		
662:10	662:15		
663:24	664:12		
664:20	665:16		
675:5	675:10		

Beginning Page:Line	Ending Page:Line	Movant's Objection	Movants Counter-Designations
675:14	675:15		
675:24	676:3		
676:6	676:6		
677:11	677:15		
679:25	680:16		
680:22	681:10		
682:1	682:14		
685:25	685:25		
686:3	686:8		
692:10	693:16		
693:19	693:19		
701:7	701:14		
709:10	709:21		
711:25	712:3		
713:19	713:22		
714:2	714:4		
720:19	720:22		
720:25	721:2		
721:16	721:20		
721:25	721:25		
726:19	727:10		
727:21	728:3		
728:7	728:10		
731:18	731:20		
732:6	733:1		
736:2	736:14		
737:21	738:8		
738:18	739:9		
741:12	741:20		
742:3	742:12		
742:22	742:22		
744:3	744:5		
744:8	744:8		
751:11	751:14		
751:17	751:17		
752:23	753:1		
756:2	756:11		
757:8	757:14		
760:5	760:11		
763:15	764:3		
765:13	765:15		
766:14	766:20		

Beginning Page:Line	Ending Page:Line	Movant's Objection	Movants Counter-Designations
767:3	767:9		
767:14	768:2		
769:10	769:12		
769:19	769:20		
772:16	772:20		
776:17	776:21		
776:25	777:10		
780:20	780:25		
781:7	781:14		
782:6	782:21		
784:16	785:1		
785:6	785:16		
785:25	786:7		
790:3	790:12		
790:15	790:20		

Dated: New York, New York
June 20, 2021

GLENN AGRE BERGMAN & FUENTES LLP

By: /s Michael Paul Bowen
Michael Paul Bowen

55 Hudson Yards, 20th Floor
New York, New York 10001
T: 212-358-5600 mbowen@glennagre.com

Attorneys for the Debtor Orly Genger